

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Norberto Ramos)	Chapter 13
Aracelly Ramos)	Case No. 20 B 19758
Debtor(s))	Judge Deborah L. Thorne

Notice of Motion/Certificate of Service

Norberto Ramos
2414 N 76th Ave, Apt 1E
Elmwood Park, IL 60707

Debtor Attorney: Cutler & Associates Ltd
via Clerk's ECF noticing procedures

Aracelly Ramos
2414 N 76th Ave, Apt 1E
Elmwood Park, IL

On December 02, 2020 at 1:00 pm, I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 9362 1728 and the password is none. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Tuesday, November 24, 2020.

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE

Objection to Discharge

Comes now Marilyn O. Marshall, Standing Trustee, and requests that the Court enter an Order denying the debtors' discharge pursuant to 11 U.S.C. § 1328(f) and Rule 4004, and in support thereof respectfully states the following:

1. Debtors filed for Chapter 13 relief on November 4, 2020.
2. Previous to the case at bar the following case was filed:

<u>Case Number</u>	<u>Debtor Name</u>	<u>Filed Date</u>	<u>Discharged Date</u>
1:2010bk06855	Ramos, Norberto (db) (title: Norberto	02/21/2010	11/09/2011
1:2018bk22297	Ramos, Norberto (db) (title: Norberto	08/08/2018	11/07/2018

3. Debtors received a discharge in the Chapter 7 case that was filed within 4 years of the filing of the present case.
4. Because the debtor received a discharge in a case filed within the preceding time frame, the debtor is not entitled to a discharge in this case.

WHEREFORE, the Trustee prays that this Court enter an Order denying the debtors' discharge, and for any and all other relief this Court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

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/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

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4. Because the debtor received a discharge in a case filed within the preceding time frame, the debtor is not entitled to a discharge in this case.

WHEREFORE, the Trustee prays that this Court enter an Order denying the debtors' discharge, and for any and all other relief this Court deems just and proper.

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(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE